



**Via ECF and Email**

July 10, 2025

Hon. Jennifer E. Willis  
United States District Court  
Southern District of New York  
40 Foley Square, Room 425  
New York, NY 10007  
WillisNYSDChambers@nysd.uscourts.gov

This request is GRANTED. The in-person conference is ADJOURNED to **September 2, 2025, at 10:00 AM**. No further adjournments will be granted. SO ORDERED.

A handwritten signature in black ink that reads "Jennifer E. Willis".

JENNIFER E. WILLIS  
United States Magistrate Judge  
July 28, 2025

**Re: Judgment Creditor Loan on Fine Arts LLC's Letter Response to Order for August 22, 2025 In-Person Conference - *Loans on Fine Art LLC v. Ian S. Peck et al.*; Case 1:23-cv-04143-JHR-JW (S.D.N.Y.)**

Dear Judge Willis:

This Firm represents Petitioner/Judgment Creditor Loans on Fine Art, LLC ("LoFA") in the above-referenced action. This letter is being submitted in response to the Court's Order setting the Parties' conference as to their discovery disputes for August 22, 2025. ECF Doc. No. 131.

Initially, this Court set an in-person discovery conference concerning the numerous outstanding discovery disputes for July 7, 2025. ECF Doc. No 127 (ECF Doc. Nos. 101, 104, 106, 108–10, 112, 115–19, 121–23, 125–26). Thereafter, Defendants requested an adjournment due to their counsels' vacation schedules, which this Court granted. ECF Doc. Nos. 128-131.

Undersigned counsel for Plaintiff is scheduled to be out of state on August 22, 2025, for a personal matter, and respectfully requests that the Court reschedule the discovery conference to a mutually agreeable date as outlined below. Given the Court's schedule, and the 7 months that have passed since the Parties' discovery disputes were initially brought to the Court's attention, Plaintiff requests that in the event a revised date cannot be scheduled in the short-term, that counsel for Plaintiff be permitted to attend the August 22, 2025 date remotely to avoid further delay.

Counsel for Plaintiff has significant availability before and after August 22, 2025, and is available for an in-person conference on July 29-31, August 4-6, 11-20<sup>1</sup>, 26-29, and September 1-

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<sup>1</sup> Availability on July 29-31 and August 4, 18-20, would include attendance by the undersigned's colleague, Cristina Vicens Beard, whose motion for *pro hac vice* admission is forthcoming, and subject to her admission being granted. Ms. Vicens is well-familiar with the pending discovery disputes.

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5. On July 8, 2025, in an attempt to meet and confer with counsel for Defendants as to availability, prior to submitting this letter request, the undersigned provided these dates to counsel for Defendants and requested dates of availability. Counsel for Defendants did not respond.<sup>2</sup>

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Bluestone', with a stylized flourish at the end.

M. Zachary Bluestone

Cc: Counsel of record

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<sup>2</sup> Given counsel for Defendants' lack of interest in any meet and confer, Plaintiff requests that any deadline to submit a joint report prior to the conference not be an impediment to scheduling an available conference date for the Court. ECF Doc. No. 191-1.